

**REDACTED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANGELA JONES,

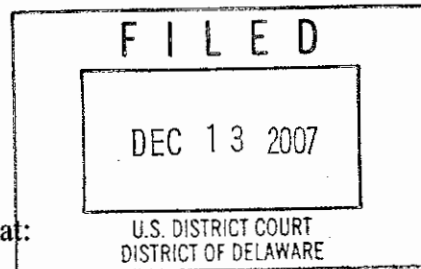
Defendant.

**REDACTED**

Criminal Action No. 07-171

**INDICTMENT**

The Grand Jury for the District of Delaware charges that:

**COUNT ONE**

From on or about November 5, 2007, through on or about November 15, 2007, in the State and District of Delaware, Angela Jones, defendant herein, did knowingly possess in and affecting interstate and foreign commerce, a firearm, that is, a Cobra, model FS32, .32 caliber handgun, serial number FS021180, after having been convicted on or about March 16, 2001, of a crime punishable by imprisonment for a term exceeding one year, in the Delaware County Court of Common Pleas for the Commonwealth of Pennsylvania, in violation of Title 18, United States Code, Sections 922(g)(1) & 924(a)(2).

**COUNT TWO**

On or about October 16, 2007, in the State and District of Delaware, Angela Jones, defendant herein, in connection with the attempted acquisition of a firearm, to wit a Cobra, model CA32, .32 caliber handgun, from Miller's Gun Center, Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Miller's Gun Center, Inc., which statement was intended and likely to deceive Miller's Gun Center, Inc., as to a fact material to the lawfulness of such sale of the said firearm to the defendant

under Chapter 44 of Title 18, in that the defendant executed a Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she had not been convicted in any court of a felony or any other crime, for which the judge could have imprisoned her for more than one year, when in fact she had been convicted on or about March 16, 2001, of a crime punishable by imprisonment for a term exceeding one year, in the Delaware County Court of Common Pleas for the Commonwealth of Pennsylvania, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

### **COUNT THREE**

On or about October 16, 2007, in the State and District of Delaware, Angela Jones, defendant herein, knowingly made a false statement and representation to Miller's Gun Center, Inc., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required under the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Miller's Gun Center, Inc., in that the defendant executed a Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she had not been convicted in any court of a felony or any other crime, for which the judge could have imprisoned her for more than one year, when in fact she had been convicted on or about March 16, 2001, of a crime punishable by imprisonment for a term exceeding one year, in the Delaware County Court of Common Pleas for the Commonwealth of Pennsylvania, in violation of Title 18, United States Code, Section 924(a)(1)(A).

### **COUNT FOUR**

On or about November 15, 2007, in the State and District of Delaware, Angela Jones, defendant herein, knowingly and intentionally possessed cocaine base, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 844(a).

**NOTICE OF FORFEITURE**

Upon conviction of one or more of the offenses alleged in Count One of this Indictment, defendant Anglea Jones shall forfeit to the United States pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461(c), any property, real and personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the above offense(s); all property, real or personal, that was used to facilitate, or was intended to be used to facilitate the commission of the offense(s); and, all firearms and ammunition involved in the commission of the offense(s), including but not limited to the following:

Cobra, model FS32, .32 caliber handgun, serial number FS021180

A box of fifty (50) rounds of Fiocchi 7.65 Browning ammunition.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY  
United States Attorney

BY:   
Shawn A. Weede  
Assistant United States Attorney

Dated: December 13, 2007